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December 10, 1999

Dr. Elizabeth Yetley Office of Special Nutritionals Food and Drug Administration 200 C Street SW Washington D.C. 20204

Dear Dr. Yetley:

We are offering for sale the following product Pure Gels Echinacea Extract, with the following Structure/Function claim: Assists the Body's Defenses.

The FDA disclaimer will also appear on the label.

Sincerely,

Katie Ferren

Marketing Director

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